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*ADMITTED IN VA ONLY

April 4, 1994

'APR 4 1994

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF SEGRETARY

RE: Ex Parte Presentation by Pegasus Communications, Inc. FCC 93-451, Gen. Docket NO. 90-314

Dear Mr. Caton:

On behalf of Pegasus Communications, Inc., enclosed please find an original and one copy of the presentation made to Mr. Ralph Haller and other members of the FCC PCS task force on April 4, 1994 in reference to the above-referenced docket. At the time of this writing, the following PCS task force members were scheduled to be present: Mr. Ralph Haller, Mr. John Williams (OPP), Mr. Bruce Franca, and Mr. Richard Ingleman (OET).

If you have any questions, please do not hesitate to contact the undersigned counsel.

Very truly yours,

James E. Meyers Susan R. Athari

Counsel for

Pegasus Communications, Inc.

Mine

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PEGASUS COMMUNICATIONS, INC.
PRESENTATION BEFORE FCC STAFF

HIGHLIGHTS OF THE MAYAGUEZ-PONCE BTA

Pegasus Communications, Inc. submitted an unopposed Petition For Reconsideration in FCC 93-451, GEN Docket No. 90-314, requesting the Commission to establish a second BTA in Puerto Rico to encompass the Mayaguez/Aguadilla-Ponce trading centers ("Mayaguez-Ponce BTA").

Points of Consideration:

- Two BTAs should be established for Puerto Rico along the lines in the attached list and county demarcation map: (1) the San Juan BTA; and (2) the Mayaguez-Ponce BTA. (See Exhibit A).
- The 1990 Bureau of Census data states the population of Puerto Rico is 3,522,037. The large population on the island of Puerto Rico warrants the award of an additional BTA. The proposed Mayaguez-Ponce BTA has a population of 1,048,473. The proposed San Juan BTA has a population of 2,473,564. (See Exhibit B).
- Mountainous terrain and rough roads make travel from the southern and western portions of the island an arduous and time-consuming process, fundamentally isolating most regions in the proposed Mayaguez-Ponce BTA from the regions of the proposed San Juan BTA. (see Exhibit C [topographical map]). These geographic and infrastructure limitations have contributed significantly to the development of separate trading patterns justifying separate BTAs, generally in the manner determined by Rand McNally. (The Rand McNally commercial atlas used by the FCC ignored Puerto Rico.)
- Mayaguez/Aguadilla and Ponce serve as centers for shopping goods purchases for the western and southern portions of the island. These shopping patterns comport with the Rand McNally approach to a Basic Trading Center. Both Mayaguez and Ponce have extremely large shopping centers, rivaling only San Juan's. (see Exhibit D [Community Profiles for Mayaguez and Ponce]).
- The port cities of Mayaguez and Ponce are separate industrial and commercial centers in their own right. They attract numerous corporations distinct from those in San Juan. Businesses in the proposed Mayaguez-Ponce BTA employ almost exclusively residents of the proposed Mayaguez-Ponce BTA. (see Exhibit D).

BARAFF, KOERNER, OLENDER & HOCHBERG, P. C.

FCC PCS Presentation April 4, 1994 Page - 2 -

- There is relatively little cross-island mobility on the island. The overwhelming majority of the residents of each of the proposed BTAs also work within that same BTA. While there is commuter mobility within each of the proposed BTAs, there is virtually no commuter mobility across proposed BTA lines. (For example, approximately .9 % of the residents of the proposed Mayaguez-Ponce BTA commute to areas within the proposed San Juan BTA; approximately 2.1 % of the residents of the proposed San Juan BTA commute to areas within the proposed Mayaguez-Ponce BTA for employment. (see Table VI, attached as Exhibit E).
- Absence of cross-BTA mobility and a large standing workforce within each BTA confirms that residents of each of the BTAs remain in their respective regions and purchase their shopping goods at the respective commercial shopping centers located within their respective BTAs (see Exhibit D).
- Establishing the two proposed BTAs for Puerto Rico will ensure that PCS service is evenly and adequately provided to the entire island, rather than a gradual emanation from San Juan.

Contact persons: Mr. James E. Meyers, (202) 686-3200 Ms. Susan A. Athari, (202) 686-3200 On behalf of Pegasus Communications, Inc.

a:\pegasus\bta.fcc

EXHIBIT A

COUNTIES IN THE PROPOSED MAYAGUEZ-PONCE BTA AND SAN JUAN BTA AND COUNTY DEMARCATION MAP

COUNTIES TO COMPRISE THE MAYAGUEZ BTA

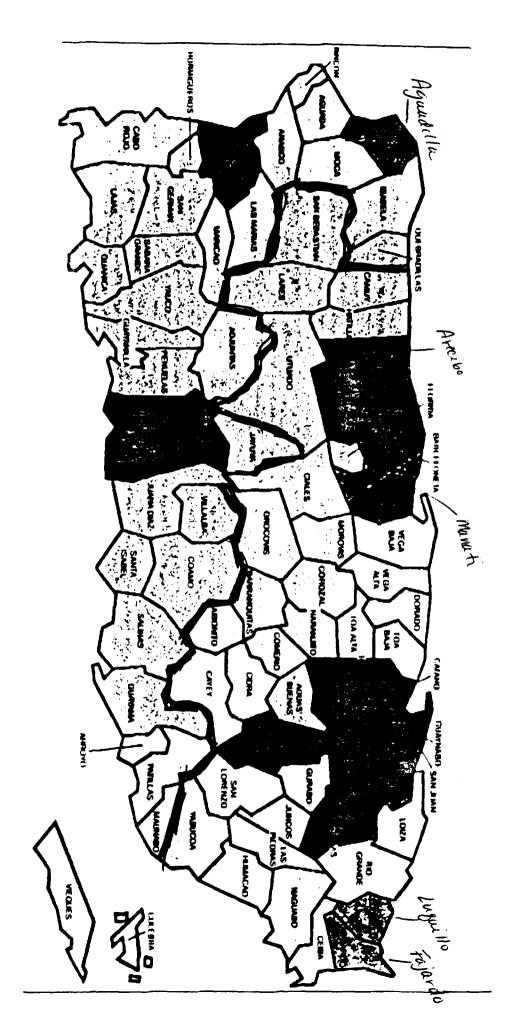
- 1. QUEBRADILLAS
- 2. ISABELA
- 3. MOCA
- 4. AGUADILLA
- 5. AGUADA
- 6. RINCON
- 7. ANASCO
- 8. LAS MARIAS
- 9. MAYAGUEZ
- 10. MARICAO
- 11. SAN GERMAIN
- 13. HORMIGUEROS
- 14. CABO ROJO
- 15. LAJAS
- 16. SABANA GRANDE
- 17. GUANICA
- 18. YAUCO
- 19. GUAYANILLA
- 20. PENUELAS
- 21. ADJUNTAS
- 22. JAYUYA
- 23. PONCE
- 24. VILLALBA
- 25. JUANA DIAZ
- 26. COAMO
- 27. SANTA ISABEL

- 28. SALINAS
- 29. GUAYAMA
- 30. ARROYO
- 31. PATILLAS
- 32. MAUNABO

COUNTIES TO COMPRISE THE SAN JUAN BTA

- 1. Camuy
- 2. San Sebastian
- 3. Lares
- 4. Hatillo
- 5. Florida
- 6. Utuado
- 7. Ciales
- 8. Barceloneta
- 9. Vega Baja
- 10. Vega Alta
- 11. Morovis
- 12. Orocovis
- 13. Dorado
- 14. Toa Baja
- 15. Corozal
- 16. Naranjito
- 17. Rio Grande
- 18. San Juan
- 19. Toa Alta
- 20. Trujillo Alto
- 21. Bayamon
- 22. Canovanas
- 23. Catano
- 24. Comerio
- 25. Guaynabo
- 26. Loiza

- 27. Manati
- 28. Arecibo
- 29. Aibonito
- 30. Barranquitas
- 31. Aguas Buenas
- 32. Caguas
- 33. Cayey
- 34. Cidra
- 35. Gurabo
- 36. San Lorenzo
- 37. Fajardo
- 38. Luquillo
- 39. Ceiba
- 40. Humacao
- 41. Juncos
- 42. Las Piedras
- 43. Naguabo
- 44. Yabucoa
- 45. Culebra
- 46. Vieques



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CLASIFICACION DE LOS MUNICIPIOS DE ACUERDO CON LA MOVILIDAD LABORAL

-62-

8-Municipios Intermedios 9-Municiples Cunei-Autonomos 1-Municipies Autonomos

Zona-A CO

EXHIBIT B

U.S. BUREAU OF CENSUS DATA FOR PUERTO RICO

Rank(R) R 15 OF 16 Database CENDATA

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Mode PAGE

RN 18 21 00 101

Section: 18 (1990 Census)

April 25, 1991

CENSUS BUREAU RELEASES 1990 CENSUS POPULATION COUNTS FOR PUERTO RICO AND ITS MUNICIPIOS For more information contact Public Information Office (301) 763-4040.

For Immediate Release CB91-142

The U.S. Census Bureau has released the 1990 census population counts for PUERTO RICO and each of its 78 municipios.

The counts were delivered to the governor's office by Assistant Census Director Peter A. Bounpane. Mr. Bounpane also met with representatives from the Association of Mayors and the Federation of Municipios. The complete listing of the final counts was mailed to each mayor.

These data are not suitable for redistricting; the population counts by blocks needed for redistricting will be released in June to the chief justice of the PUERTO RICO Supreme Court, and leaders of the Popular Democratic Party, New Progressive Party, and Pro Independence Party.

This table provides final 1990 census population counts for PUERTO RICO

its municipios. These counts are not suitable or intended for redistricting; the Bureau of the Census will provide redistricting counts at the block level for PUERTO RICO in June 1991.

GOVERNMENTAL UNIT

CODE	NAME Persons	
ST 72 CO 72 001 CO 72 003 CO 72 005 CO 72 007 CO 72 009	PUERTO RICO3,522,037 Adjuntas Municipio	
CO 72 011 CO 72 013 CO 72 015 CO 72 017	Anasco Municipio	•

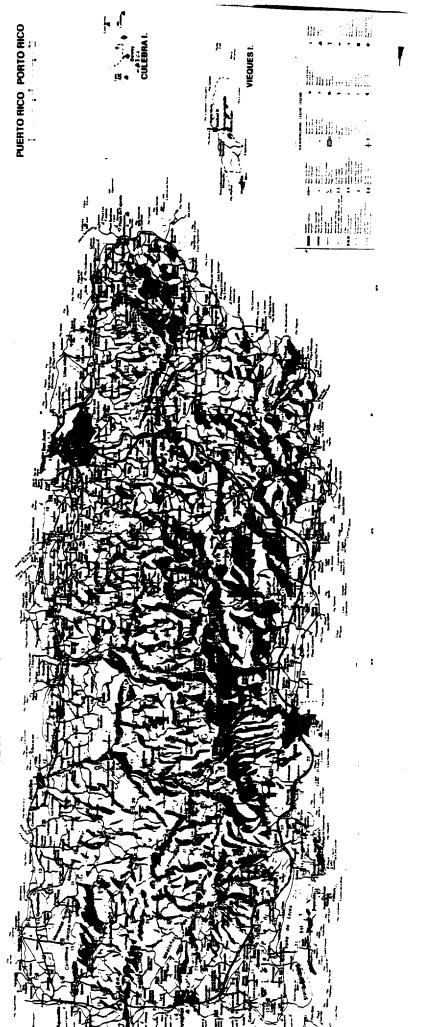
СО	72	019	Barranquitas Municipio	25,605
C O	72	021	Bayamon Municipio	220 262
		021	Cabo Rojo Municipio==================================	
_		025	Caguas Municipio	133,447
		023	Camuy Municipio==================================	
		027	Canovanas Municipio	36,816
CO	12	029	-	•
CO	72	031	Carolina Municipio	177,806
CO	72	033	Catano Municipio==================================	34,587
CO	72	035	Cayey Municipio	46,553
CO	72	037	Ceiba Municipio==================================	17,145
CO	72	039	Ciales Municipio	18,084
СО	72	041	Cidra Municipio	35,601
		043	Coamo Municipio==================================	
CO	72	045	Comerio Municipio	20,265
CO	72	047	Corozal Municipio==================================	33,095
CO	72	049	Culebra Municipio	1,542
СО	72	051	Dorado Municipio	30,759
		053	Fajardo Municipio==================================	
		054	Florida Municipio	8,689
CO	72	055	Guanica Municipio==================================	19,984
CO	72	057	Guayama Municipio	41,588
CO	72	059	Guayanilla Municipio	21,581
		061	Guaynabo Municipio==================================	
		063	Gurabo Municipio	28,737
		065	Hatillo Municipio==================================	32,703
		067	Hormigueros Municipio	15,212
		069	Humacao Municipio	55,203
CO	72	071	Isabela Municipio==================================	39,147
CO	72	073	Jayuya Municipio	15,527
CO	72	075	Juana Diaz Municipio==================================	45,198
CO	72	077	Juncos Municipio	30,612
СО	72	079	Lajas Municipio	23,271
		081	Lares Municipio==================================	29,015
		083	Las Marias Municipio	9,306
		085	Las Piedras Municipio==================================	27,896
		087	Loiza Municipio	29,307
CO	72	089	Luquillo Municipio	18,100
		091	Manati Municipio==================================	
		093	Maricao Municipio	6,206
		095	Maunabo Municipio==================================	12,347
		097	Mayaguez Municipio	100,371
СО	72	099	Moca Municipio	32 926
		101	Morovis Municipio==================================	25,288
		103	Morovis Municipio==================================	22,620
	. —		(C) FORMAT ONLY 1994	DIALOG INFO.SERV.

		105 107	Naranjito Municipio==================================	27,914 21,158
CO CO	72 72 72	109 111 113 115 117	Patillas Municipio Penuelas Municipio==================================	19,633 22,515 187,749 21,425 12,213
CO CO	72 72 72	119 121 123 125 127	Rico Grande Municipio	45,648 22,843 28,335 34,962 437,745
CO CO CO CO CO	72 72 72 72 72 72 72 72 72	129 131 133 135 -137 139 141 143 145	San Lorenzo Municipio	35,163 38,799 19,318 44,101 89,454 61,120 34,980 34,559 55,997 8,602
CO	72	149 151 153	Villalba MunicipioYabucoa Municipio==================================	23,559 36,483 42,058

For more information contact Lourdes N. Flaim (301) 763-2903.

⁽C) FORMAT ONLY 1994 DIALOG INFO.SERV.

EXHIBIT C TOPOGRAPHICAL MAP OF PUERTO RICO



(AILINIK) OCEANI

MILMINISCHEN UZEMIN

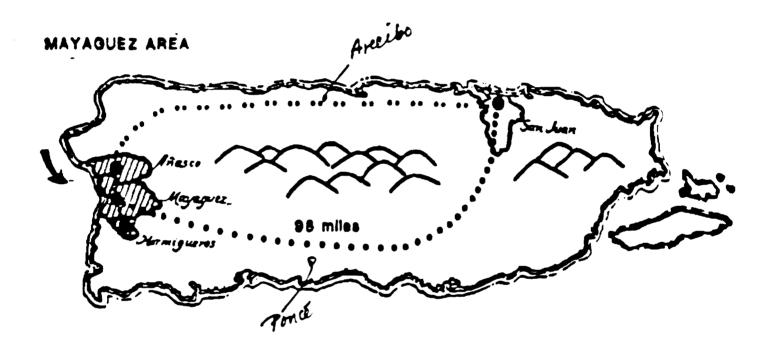
EXHIBIT D COMMUNITY PROFILES FOR MAYAGUEZ AND PONCE

EMMUNITY ROFILE

for MAYAGUEZ AREA: Mayaguez, Añasco and Hormiguero

1

PUERTO RICO



Highlights:

Skilled labor force
Completely bilingual

Efficient transport service

Grante incentives .

POPULATION

According to estimates of the U.S. Bureau of the Census, the Mayaguez area had a total of 132,814 residents in 1980. By 1982, population increased 3% to reach an estimated 136,992. The population was divided among townships as follows: Mayaguez 98,268 persons, Añasco 23,717, and Bormigueros 15,007.

ACCESSIBILITY

The Mayaguez area is located in the western part of the Island, approximately 98 miles from San Juan. An extensive highway system provides easy, efficient access from any location on the Island to the Mayaguez area's industrial sites. Mayaguez is an important port area. There are intra-island sirport facilities and a deep-water harbor, which is the most important shipping point on the west coast.

The Mayaguez Foreign Trade Zone is a major asset in this area. The zone occupies approximately 42 acres of land and is primarily dedicated to manufacturing operations.

Mayaguez and Hormigueros are both ten year tax exemption somes, while Añasco enjoys 15 years of industrial tax exemption.

PACILITIES

Due to its wide territorial extension and numerous facilities, the city of Mayaguez is designated as the center of the west coast. Medical clinics, private and public hospitals and bilingual schools are readily available. Among the bilingual schools offering services in the area, the Southwestern Educational Society in Mayaguez has achieved acclaim from industrialists. The school opened ten years ago and has been accredited by the Department of Education. Classes are conducted in English and Spanish is taught from kindergarten on. The school's curriculum is geared to preparing its graduates for entrance into any college on the mainland or in Puerto Rico.

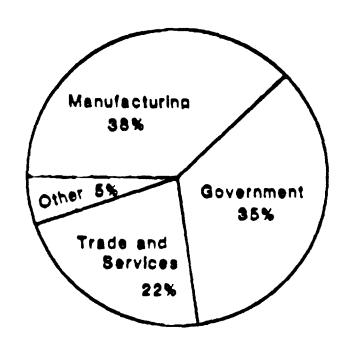
The University of Puerto Rico-Mayagues Campus is a member of the Middle States Association of Colleges and Secondary Schools as well as the Spanish American Association of Universities. It offers a wide curriculum in undergraduate through post-graduate studies.

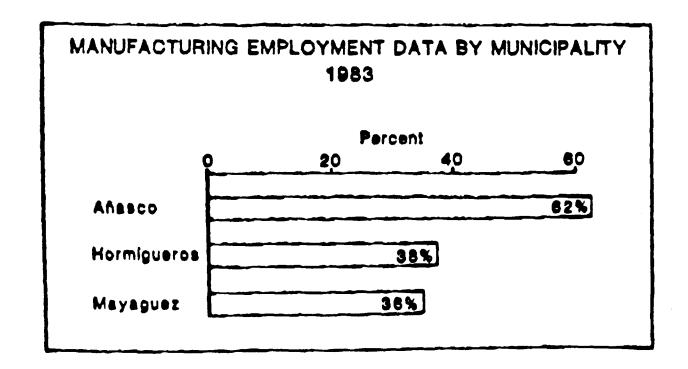
Watersports and beautiful beaches can be enjoyed all year round.

LABOR FORCE AND EMPLOYMENT

In March 1983, approximately 38,700 residents comprised the Mayaguez area labor force. Total employment of 31,900 is widely distributed among the various economic sectors of the economy. Manufacturing is the area's major source of employment accounting for 38% of employed residents.

EMPLOYMENT PERCENTAGE SHARE BY INDUSTRY





MANUFACTURING EXPLOYMENT

Edvards Labs.

Sumble Bee

(Afasco) (soundings)

Olayagues) (tuna)

According to the Puerto Rico Department of Labor's annual Census of Manufacturing Industries, in October 1981 there were 78 manufacturing plants in the Mayaguez area.

Mayagues	Number of Plants	Production Workers 8,328	Average Rourly Earnings \$4.19	during March 19 percent of the unemployment re	983, representing total labor for attention to the Island	ng 17.6 rcs. The and as a
Añasco Eormigues	16 ros 11	1,876 710	4.57 3.73	Municipality	Unemployment	Percent
A selected in the and follows:	d list of	prominent man O employees a	ufacturers nd over	Mayaguez Añasco Bormigueros	4,535 1,571 694	66.7 23.1 10.2
Name of (Company	Employ Suct) Rang	•	.) Total	6,800	100.00
	Laboratorio (antibio		50 23,171		break down of the Mayaguez ar ims:	
Eli Lilly Oteysgue:		151-2	00 18,320	Sex	Unemployed	Percent
Margo Glo	oves Bros)(glove	151-2	00 12,000	Males Females	4,223 2,577	62.1 37.9
Blue Bell (Añasco)	l (dungareas)	151-2	00 22,725	Total	6,800	100.00
Willids, (Afasco)	Inc. (brassiere	201-2	50 22,660		Unemployed 231	Percent 3.4
G.Z. Prot (Añasco)	tective le: (relays)	leys 251-3	00 40,963	Under 22 years 22 to 44 years 45 years and o	4,882	71.8
E.T. Inda (Hornigue	estries Bros) (dres	251 -3 sea)	00 37,894	Total	6,800	100.00
Propper (Intl. t) (militar	301-3 7 eq.)	50 41,762	INDUSTRY is wh	ich last worked <u>Unemployed</u>	: Percent
Meptune (Mayague)	t) (tuna)	451-5	00 24,387	Apparel Trade & Bervio	1,958	28.8 13.5
Blue Bel		5 01-5	30 24,948	Tood & Tindred		11.9 4.0 4.0

451-500

1,201-1,250 100,000

24,387

Starkist

(Mayagues) (tuna)

UNE PLOYMENT

Blectronic

Other

Total

2,371

6,800

37.8

100.00

3,101-3,150 193,600

The total number of jobless persons in the

Mayaguez area was estimated at 6,800

•	Unemployed	Percent
Bench Work	1,883	27.7
Clerical and Sales	9 59	14.1
Services	728	10.7
Structural	694	10.2
Prof., Tech. & Mgr.	537	7.9
Machine Trades	381	5.6
Processing	272	4.0
Other	1,346	19.8
	6,800	100.00

PUBLIC DTILITIES

Blectric power. The Puerto Rico Electric Fower Authority, a government-owned power utility, offers electrical services to industrial customers in the Mayaguez area. A network of interconnected primary transmission lines allows the system to supply practically any level of demand for energy that may be required in the area. Available transmission lines include transmission grids of 38 KV and 115 KV in Mayaguez, Añasco and Hormigueros. In Mayaguez, there is a switchyard for interconnections and a 40,000 KW jet power pack unit for emergency and peak demand periods.

Water and sevage. The Mayaguez area obtains its domestic water supply from filtration plants and deep wells.

	(million galle	llion gallons/day)		
	Filtration Plant	Deep Well		
Mayagues	2.0	14.0		
Añasco Bormigueros	-4	1.2		

Production Capacity

The Mayaguez area utilizes activated sludge, trickling filter, and continuous aeration for its sawage systems. The ponds are sufficient for the area's 137,000 people and presently operate at roughly 75 percent of their capacity.

INDUSTRIAL SITES

The Puerto Rico Industrial Development Company owns 671.0 cuerdas (one cuerda is almost one acre) of land in the Mayaguez area. About 53 percent is vacant and currently available for industrial purposes. All sites consist of generally leveled, well drained terrain; they are located within urban limits, and are zone for either light or heavy industry.

Land in Cuerdas

	Total	In Use	Vacant	
Mayaguez Añasco Roraigueros	592.1 60.8 18.1	261.4 36.3 18.1	330.7 24.5	
Combined Total	671.0	315.8	355.2	

INDUSTRIAL BUILDINGS

Modern factory space is available in the Mayaguer area through an extensive public program of plant construction. Private buildings and properties are also available.

The Puerto Rico Industrial Development - Company leases specialized plants and standard multipurpose factory buildings designed with maximum flexibility for light or medium-heavy industry.

	Rental Rate Sq. Ft.
Mayagues	\$1.90
Mormigueros	1.60
Afasco	1.60

Note: Rental rates apply only to existin 11,500 sq. ft. and 23,000 sq. ft. typical buildings and modular units of 4,000 sq.

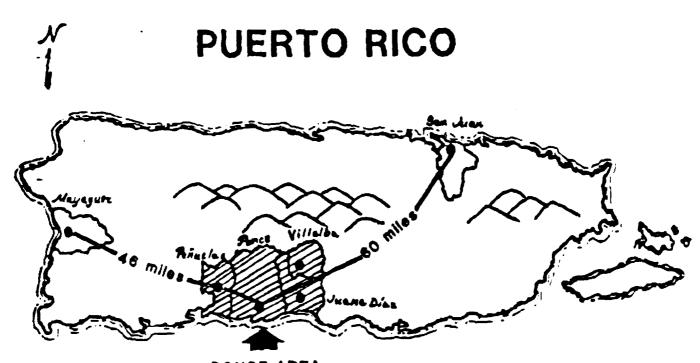
Up-to-date inventory may be obtained by ealling PRIDCO officials. PRIDCO will also construct buildings to meet special requirements upon request.

Prepared by:

Lydia Carreras Economic Development Administration Office of Economic Research October, 1983

EMMUNITY ROFILE

for PONCE AREA: Ponce, Juana Diaz, Peñueias and Villaiba



PONCE AREA

Highlights:

Motivated labor force

Efficient transport service
Substantial tax exemption

Grants and incentives

POPULATION

According to estimates of the U.S. Bureau of the Census, the Ponce area had a total of 265,410 residents in 1976. By 1982, population increased 5% to reach an astimated 282,751. The population was divided among townships as follows; Ponce 197,075 persons, Juana Diaz 44,932, Villalba 21,309 and Peñualas 19,435.

ACCESIBILITY

The Ponce area is located in the southern part of the Island 60 miles from San Juan. A major highway system places the area within 90 minutes of the San Juan Metropolitan Area and 45 minutes from the Mayaguez Foreign Trade Zone.

The deep water harbor on the south coast in Ponce is the second largest commercial port (dry cargo) in Puerto Rico. This situates the area within economical reach of most major world markets via ocean transport. Ponce also has intra-Island airport facilities which offer speedy and valuable services in handling cargo.

The municipalities of Ponce and Juana Disz are located in a 15 year tax exemption zone, while Pañuelas and Villalba enjoy 20 years of industrial tax exemption.

PACILITIES

Ponce is a large city which offers all the facets of modern city life. Medical clinics, private and public hospitals and bilingual schools are readily available. Magnificent fishing and voter sports can be practiced here all year round.

For college education, the Catholic University in Ponce is accredited by the Middle States Association of Colleges and Secondary Schools, and offers a wide curriculum in undergraduated through post-graduate studies.

LABOR FORCE AND EMPLOYMENT

In February 1982, approximately 66,800 residents comprised the Ponce area labor force. Total employment at 46,200 level is widely distributed among the various economic sectors of the economy. Manufacturing accounts for 22% of employed residents.

EMPLOYMENT: PERCENT SHARE BY INDUSTRY

